

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

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STEVEN MCCUNE,

Plaintiff,

STIPULATION

-against-

14-CV-04431 (JS))GRB)

COUNTY OF SUFFOLK, COUNTY OF SUFFOLK  
POLICE DEPARTMENT, POLICE OFFICER JOHN  
A. KURKLEN, in his individual and official capacity,  
POLICE OFFICER MICHAEL S. TURANSKY, in his  
individual and official capacity, POLICE OFFICER  
CHRISTOPHER M. ZUCCARELLO, in his individual  
and official capacity, POLICE OFFICER JOHN A.  
VOHS, in his individual and official capacity, and  
POLICE OFFICER "JOHN" AND "JANE" DOES  
1-10, Shield Nos. Unknown, individually and in their  
official capacities, as police officers of the COUNTY  
OF SUFFOLK POLICE DEPARTMENT,

Defendants.

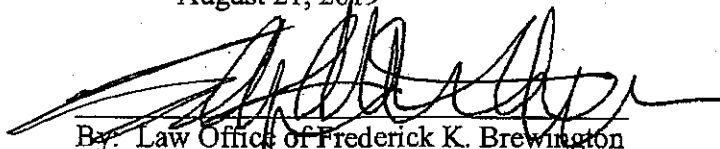
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It is hereby AGREED, CONSENTED and STIPULATED by and between the parties  
that:

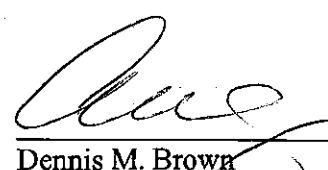
- 1) Defendants consent to plaintiff filing an Amended Complaint in the form that has been docketed with the Court as docket entry no. 16-3; and
- 2) In return for the aforesaid consent given by defendants, plaintiff agrees that defendants' right to pursue, hereafter raise, move upon, and defend this case based upon any and all defenses generally available to a defendant, including but not limited to those set forth in Rules 56, 59

and 60, are fully reserved without prejudice, since defendants do not intend to make a Rule 12(b)(6) motion.

Dated: Hauppauge, New York  
August 21, 2019



By: Law Office of Frederick K. Brewington  
Attorney for Plaintiff  
556 Peninsula Blvd.  
Hempstead, New York 11550



Dennis M. Brown  
Suffolk County Attorney  
Attorney for Defendants  
By: Arlene S. Zwilling  
Assistant County Attorney  
100 Veterans Memorial Highway  
Hauppauge, New York 11788

SO ORDERED:

Dated: August \_\_\_\_, 2019

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Hon. Gary R. Brown, U.S.M.J.